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33 IN THE UNITED STATES DISTRICT COURT
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35 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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37 **TERESA AGUIRRE,**

38 Plaintiff,

39 v.

40 **STATE OF CALIFORNIA; DEBRA**
41 **MILLS, CARIANNE HUSS; and DOES 1**
42 **through 5,**

43 Defendants.

44 4:16-cv-05564-HSG

45 **STIPULATION AND [Proposed] ORDER**
46 **TO CONTINUE PRETRIAL FILING**
47 **DEADLINE TO JULY 25, 2018**

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49 Judge: Hon. Haywood S. Gilliam, Jr.
50 Trial Date: December 3, 2018
51 Action Filed: September 30, 2016

1 Following extensive good faith meet and confer, the parties jointly request a one-week
2 continuance of the July 18, 2018 pretrial filing deadline (for a revised statement of the case,
3 revised proposed jury instructions, and revised proposed voir dire questions per Dkt. No. 161), for
4 the following reasons. As reflected in Plaintiff's trial availability schedule (Doc. 160), both
5 Plaintiff's trial counsel are on vacation July 11 through 18. As reflected in Defendants' trial
6 availability calendar (Doc. 159), defense lead counsel Lowhurst is on vacation for the period June
7 1- July 11, and DAG Plank is on vacation June 14 and 15, and from July 2 through 6. Therefore,
8 under the current schedule it is not possible for both lead counsel to jointly review and finalize the
9 pre-trial filings before the July 18 due date. Specifically, while the parties can, and will, prepare
10 draft documents in anticipation of a July 18th deadline, Defendant's lead counsel (Lowhurst) will
11 not be able to review the filings until July 12, by which time all of Plaintiff's counsel will be
12 absent. Should the Court allow, the parties stipulate to a one-week extension for the filing of the
13 revised statement of the case, revised proposed jury instructions, and revised proposed voir dire
14 questions, to July 25, 2018.

15 Dated: June 4, 2018

Respectfully submitted,

XAVIER BECERRA
Attorney General of California

/s/ Lisa J. Plank

LISA J. PLANK
Deputy Attorney General
Attorneys for Defendants
State of California, et al.

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ATTESTATION

I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Deborah Kochan.

Dated: June 4, 2018

Respectfully submitted,

XAVIER BECERRA
Attorney General of California

/s/ Lisa J. Plank

LISA J. PLANK
Deputy Attorney General
Attorneys for Defendants
State of California, et al.

[Proposed] ORDER

Good cause appearing, the Stipulation Regarding Continuance of Pretrial Filing Deadline to July 25, 2018, is hereby approved.

DATED: 6/5/2018


Haywood S. Gilliam, Jr.
U.S. District Court Judge